

November 8, 2001

Ms. Magalie Roman Salas,  
Secretary Federal Communications Commission  
Office of the Secretary  
445-12th Street, SW  
Washington, DC 20024

Ms. Salas:

Attached is Siemens Corporation filing in response to FCC MO&O and FNPRM 01-224.  
We are pleased to submit these reply comments as part of the proceedings docket.

If you need any additional information, please contact me at (202) 434-4800.

Sincerely,

Mark Esherick  
Director  
Siemens Corporation

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of Part 2 of the Commission's Rules to Allocate	)	Docket No. 00-258 and 95-18
Spectrum Below the 3 GHz for Mobile and Fixed Services	)	
to Support the Introduction of New Advanced Wireless	)	
Services, including Third Generation Wireless Systems	)	
	)	
Amendment of Section 2.106 of the Commission's Rules to	)	IB Docket No. 99-81
Allocate Spectrum at 2 GHz for Use By the Mobile-Satellite	)	
Service	)	
	)	
The Establishment of Policies and Service Rules for the	)	
Mobile-Satellite Service in the 2 GHz Band		RM-94-98
Petition for Rulemaking of the Wireless Information		
Networks Forum Concerning the Unlicensed Personal		
Communications Service		
		RM-10024
Petition for Rule Making of UTStarcom, Inc., Concerning		
The Unlicensed Personal Communications Service		

**Reply Comments of Siemens Corporation**

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Siemens Corporation is pleased to submit an interim band proposal for FCC consideration that could satisfy the critical need for additional spectrum for third generation(3G) wireless services. As the record in these proceeding shows, it is not enough that the FCC provide additional spectrum without also considering whether the spectrum is globally harmonized. Greater spectrum harmonization will benefit American consumers by creating significant economies of scale and scope that will drive down prices for both equipment and services.

We support the comments of many of the respondents who argue that the FCC should adopt a comprehensive, strategic plan when making allocations decisions. AT&T Wireless states that, "In making spectrum available for 3G services, the Commission must consider the frequency bands under consideration as part of a comprehensive plan." Cingular argues that 3G spectrum "should not be allocated in a piecemeal fashion."

The Commission has sought comments on the potential use of frequency bands below 3GHz for advanced terrestrial wireless services. Siemens recommends that the FCC consider the following proposals.

#### **Recommendations**

- 1) Reallocate bands 1980-2010 / 2170-2200 MHz for terrestrial wireless systems.
- 2) Allow the use of the 1910-1930 MHz band for 3G with respect to worldwide harmonization (i.e. 1920-1930 / 2110-2120 MHz with FDD mode and 1910-1920 MHz with TDD mode).
- 3) Consider all possible solutions that would permit the introduction of 3G systems in the United States in such a way that would facilitate global harmonization of 3G spectrum usage (for example, pairing of 1710-1785 MHz with 1805-1880 MHz).
- 4) Siemens recognizes that it may not be practical to consider a 3G allocation at the 1710-1785 MHz paired with 1805-1880 MHz band in the short term. However, Siemens would urge the Commission to refrain from taking action that would preclude this as a possibility in the future.

#### **Conclusion**

The U.S. deployment of third generation wireless networks is an important and necessary objective. As evidenced by the extensive record in this proceeding, there are many issues that need to be addressed in order to ensure that these networks are deployed in an effective and timely manner. Siemens strongly encourages the FCC to keep focused on the important, universally supported goals of allocating sufficient spectrum that is globally harmonized.

